

## UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

v.

Case No.

17-MS-499 HB

TODD SEAVER KNUTSON

## CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT 1

On or about June 6, 2017, in Ramsey County, in the State and District of Minnesota, defendant possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(A).

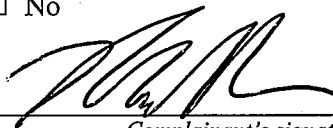
COUNT 2

On or about June 6, 2017, in Ramsey County, in the State and District of Minnesota, defendant, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce firearms, in violation of Title 18, United States Code, Sections 922(g)(1) & 924(a)(2).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No



Complainant's signature

Matt Parker, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

6/7/17

City and State: St. Paul, MN



Judge's Signature

Hildy Bowbeer, U.S. Magistrate Judge

Printed Name and Title

SCANNED

JUN 07 2017

U.S. DISTRICT COURT ST. PAUL

17-MJ-499 HB

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STATE OF MINNESOTA )  
 )  
COUNTY OF RAMSEY )

ss. AFFIDAVIT OF MATTHEW PARKER

I, MATTHEW PARKER, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been so employed in this capacity for eighteen years. I am currently assigned to the FBI Twin Cities Safe Streets Violent Gang Task Force in Minneapolis, Minnesota. As a Special Agent of the FBI on this task force, my duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of Federal laws, including those laws found in Title 18 and Title 21, United States Code.

2. I am an investigator or law enforcement officer of the United States within the meaning of 18 U.S.C. Section 2510 (7); that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for drug and gun offenses.

3. This Affidavit is submitted in support of a criminal complaint charging Todd Seaver Knutson with possession with intent to distribute methamphetamine, in violation of Title 21 U.S.C. § 841(a)(1), and being a felon in possession of firearms, in violation of Title 18 U.S.C. § 922(g)(1).

4. The facts and information contained in this Affidavit are based upon my own investigation and observations of other agents and law enforcement officers involved in the investigation. This Affidavit contains information necessary to support probable cause

for the attached Complaint. It is not intended to include each and every fact and matter observed by me or known to the Government.

5. Todd Knutson has 10 felony convictions in the state of Minnesota including but not limited to narcotics, fleeing, assault, burglary and terroristic threats. As such, he is ineligible to possess a firearm under federal law.

6. On 06/06/2017, the FBI Safe Streets Task Force ("SSTF") and St. Paul Police arrested Knutson after he left his home at 890 Arkwright, St. Paul, MN, and went to the SA gas station on the corner of Arkwright and Maryland Avenue in St. Paul. When law enforcement approached Knutson in front of the gas station, Knutson fled on foot, running all the way around the gas station and back out onto Maryland Avenue where he was apprehended. Law enforcement conducted a search of the area of flight and recovered cash that Knutson dropped while he was running. Surveillance video from the SA was reviewed on 06/07/2017 and it appears to show Knutson throwing something in the air as he is running from police. An additional search was then conducted and a Lorcin .25 caliber handgun was located on the roof of the SA gas station. The serial number on this gun was obliterated.

7. Following the arrest, SSTF conducted a search warrant at Knutson's home at 890 Arkwright. During the search, law enforcement located items relevant to this investigation. Prior to arresting Knutson, SSTF personnel saw Knutson leave 890 Arkwright on his motorcycle. A cousin of Knutson's was interviewed during the search warrant. The cousin stated that Knutson lived at the Arkwright house with his girlfriend,

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who was not present. The cousin also stated that he had recently purchased a quantity of methamphetamine from Knutson. A female who was present during the warrant stated that the home was Knutson's home and that she was visiting. In addition, multiple mailings were located at the residence in the name of Todd Knutson. The home had three bedrooms but only one of the bedrooms had a bed in it. The home had surveillance cameras inside and outside of the home.

8. The following items were located in the Arkwright residence:

FN Handgun, 9mm, serial GKU0055031

Rugar Vaquero handgun, .45 caliber, serial 5630330

Rugar Vaquero handgun, .45 caliber, serial 5681849

MAK 90 rifle, 7.62mm, serial 9324932

Master Piece Arms Mac 10 handgun, .45 caliber, serial A1064

Marlin rifle, .22 caliber, serial 72475861

Methamphetamine, approximately 1481 grams, field tested positive

Marijuana, approximately 20 grams, field tested positive

Bullet proof vest


9. Three of the guns were located in the bedroom with the bed, two of the handguns were located in a bedroom with no bed, one of the guns was located in the living/dining room area of the house. Four of the listed guns were reported as stolen in NCIC. The methamphetamine was found in a backpack in the closet of a bedroom with no bed, which is the same closet where two of the handguns were found.

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10. Your affiant spoke with a firearms expert at the ATF who told your affiant that none of the seven guns mentioned in this affidavit were manufactured in Minnesota and, therefore, must have travelled in interstate commerce.

11. Based on the above stated facts, your Affiant believes probable cause exists that Todd Seaver Knutson possessed methamphetamine with intent to distribute it, in violation of Title 21 U.S.C. § 841(a)(1), and was a felon in possession of firearms, in violation of Title 18 U.S.C. § 922(g)(1).

Further your Affiant sayeth not.



Matthew Parker  
Special Agent, Federal Bureau of Investigation

Sworn and subscribed to before me  
this 7<sup>th</sup> day of June 2017.



The Honorable Hildy Bowbeer  
UNITED STATES MAGISTRATE JUDGE